

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

NORTHROP GRUMAN SHIP SYSTEMS,
INC., f/k/a/ INGALLS SHIPBUILDING,
INC., and

Plaintiff,

RICHARD F. SCRUGGS,
d/b/a SCRUGGS LAW FIRM , P.A.; and
PODHURST ORSECK, P.A.

Intervenor Plaintiffs,

v.

THE MINISTRY OF DEFENSE OF THE
REPUBLIC OF VENEZUELA, and
BANK OF NEW YORK

Defendants.

Case No. 1:02-cv-785-HSO-RHW

STATUS REPORT OF THE BANK OF NEW YORK MELLON

Even though The Bank of New York Mellon, successor to The Bank of New York, takes no position regarding the merits of the instant proceeding, out of an abundance of caution, The Bank of New York Mellon reports as follows:

In compliance with the Court's Order of October 25, 2002, filed November 8, 2002, The Bank of New York Mellon informs the Court that it continues to abide by said Order such that it has not transferred and will not transfer any funds from the Republic of Venezuela Trust Account No. 304314 for any purpose other than to pay Huntington Ingalls Incorporated, successor to Northrop Grumman Ship Services, Inc., in accordance with the Trust Agreement.

Respectfully submitted, this 5th day of March, 2018.

**THE BANK OF NEW YORK MELLON,
Defendant**

BY: /s/ Richard B. Tubertini
Richard B. Tubertini, MS Bar No. 8290
Hailey, McNamara, Hall, Larmann & Papale, LLP
302 Courthouse Road, Suite A
Gulfport, MS 39507
Telephone: (228) 896-1144
Facsimile: (228) 896-1177
rick.tubertini@hmhlp.com

Eric A. Schaffer (*Pro Hac Vice*)
Reed Smith LLP
225 Fifth Avenue
Pittsburgh, PA 15222-2716
Telephone: (412) 288-3131
Facsimile: (412) 288-3063
eschaffer@reedsmith.com

CERTIFICATE OF SERVICE

I do hereby certify that I have this date electronically filed the above and foregoing with the Clerk of the Court by using the CM/ECF system which sent notification of such to all counsel of record.

This the 5th day of March, 2018.

/s/ Richard B. Tubertini
RICHARD B. TUBERTINI
MS Bar No. 8290